

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Digital Audio Broadcasting Systems	)	
And Their Impact on the Terrestrial	)	MM Docket No. 99-325
Radio Broadcast Service	)	

**REPLY COMMENTS OF CLEAR CHANNEL COMMUNICATIONS, INC.**

In response to the Commission's June 16, 2005 *Public Notice*, DA 05-1661, Clear Channel Communications, Inc. ("Clear Channel") submits these reply comments regarding the National Radio Systems Committee's (the "Committee's") initial digital audio broadcasting ("DAB") standard entitled "In-band/On-channel Digital Radio Broadcasting Standard NRSC-5" ("NRSC-5").<sup>1</sup>

Clear Channel joins the many other radio companies and others that have urged the Commission to adopt the NRSC-5 standard as the foundation for DAB in order to facilitate the rapid deployment of the many enhancements that DAB, using the IBOC technology, will bring to terrestrial radio broadcast service in the U.S. In the same vein, Clear Channel opposes the comments of Microsoft Corporation, Broadcast Signal Lab, LLP, Impulse Radio,<sup>2</sup> and others who advocate a remand of NRSC-5 to the Committee for implementation of various additional elements, including a codec specification. Clear Channel believes that such an action is

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<sup>1</sup> These reply comments are being filed one day after the August 17, 2005 deadline specified in the *Public Notice*. To the extent necessary, Clear Channel respectfully requests acceptance and consideration of these reply comments notwithstanding their minor untimeliness.

<sup>2</sup> See Joint Comments of Microsoft Corp., Broadcast Signal Lab, LLP, and Impulse Radio (collectively "Microsoft/BSL/Impulse") (Jul. 18, 2005; corrected by Erratum filed Jul. 28, 2005) ("Microsoft/BSL/Impulse Joint Comments").

unnecessary and will only serve to delay DAB's rollout to the detriment of the radio industry and listeners alike.

Clear Channel agrees with those who recognize that the exclusion of an audio codec from NRSC-5 represents "a workable solution to a thorny problem" and does not render the standard incomplete or deficient.<sup>3</sup> Because iBiquity's codec is already in the market and is available for licensing, it is not necessary to remand NRSC-5 for specification of that codec. Moreover, the standard already allows for the use of codecs other than iBiquity's HDC codec (and for additional codecs optimized for low bit rate communications), so there is no need for further modification of the standard to ensure codec flexibility. Also contrary to Microsoft/BSL/Impulse's suggestion, NRSC-5 can be adopted without specification of a codec identifier, because digital radios can self-identify codecs. Nor is specification of a data transport scheme necessary to adopt the standard.

Clear Channel has thoroughly reviewed NRSC-5 and the Committee's process of adopting the standard. It is comfortable with both, as well as with iBiquity's commitment to license all patents necessary to implement NRSC-5 (with or without the HD codec). In Clear Channel's view, there is no need for further specification of the standard, and there is every reason for the Commission to take all actions necessary to accelerate the nationwide rollout of DAB and its accompanying benefits. Accordingly, Clear Channel urges the Commission to adopt the NRSC-5 standard without delay as part of its final DAB rules.

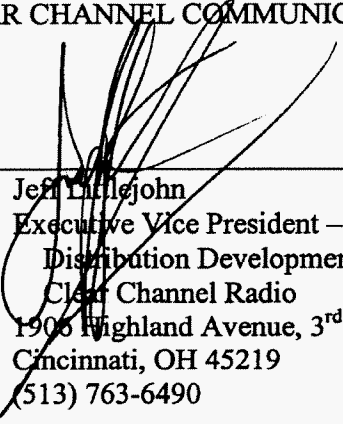
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<sup>3</sup> See Reply Comments of NAB (Aug. 17, 2005) at 7-8 (citing Comments of the Consumer Electronics Corporation (Jul. 18, 2005) at 2-3).

Respectfully submitted,

CLEAR CHANNEL COMMUNICATIONS, INC.

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